

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

RECEIVED

MAR 14 2016

RICHARD W. NAGEL
Clerk Of Court
CINCINNATI, OHIO

Jeremy P. Gollant & Laurence Little

(ENTER ABOVE THE NAME OF THE PLAINTIFF IN THIS ACTION)

ET AL
- PLAINTIFFS -

IF THE PLAINTIFF IS A PRISONER:

PRISONER #

624-283

599-448

vs.

Mr. Holdren

(ENTER ABOVE THE NAME OF THE DEFENDANT IN THIS ACTION)

IF THERE ARE ADDITIONAL DEFENDANTS PLEASE LIST THEM:

Mr. Cook

Mr. Cadogan

Ms. Graham

Jon / Jane Does x 10

COMPLAINT

I. PARTIES TO THE ACTION:

PLAINTIFF:

PLACE YOUR NAME AND ADDRESS ON THE LINES BELOW. THE ADDRESS YOU GIVE MUST BE THE ADDRESS THAT THE COURT MAY CONTACT YOU AND MAIL DOCUMENTS TO YOU. A TELEPHONE NUMBER IS REQUIRED.

Jeremy P. Gollant

NAME - FULL NAME PLEASE - PRINT

S.O.C.F. P.O. Box 25699

ADDRESS: STREET, CITY, STATE AND ZIP CODE

LUCASVILLE, OH, 25699

TELEPHONE NUMBER

IF THERE ARE ADDITIONAL PLAINTIFFS IN THIS SUIT, A SEPARATE PIECE OF PAPER SHOULD BE ATTACHED IMMEDIATELY BEHIND THIS PAGE WITH THEIR FULL NAMES, ADDRESSES AND TELEPHONE NUMBERS. IF NO ADDITIONAL PLAINTIFFS EXIST CONTINUE WITH THIS FORM.

PAGE 2 AND 3 OF THIS FORM DEAL ONLY WITH A PLAINTIFF THAT IS INCARCERATED AT THE TIME OF FILING THIS COMPLAINT.

IF YOU ARE A PRISONER FILING A CIVIL SUIT THE FOLLOWING INFORMATION IS REQUIRED:

PREVIOUS LAWSUITS:

- A. HAVE YOU BEGUN OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS ACTION OR OTHERWISE RELATING TO YOUR IMPRISONMENT? YES () NO ()
- B. IF YOUR ANSWER TO A IS YES, DESCRIBE THE LAWSUIT IN THE SPACE BELOW. (IF THERE IS MORE THAN ONE LAWSUIT, DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THE SAME OUTLINE.)

1. PARTIES TO THIS PREVIOUS LAWSUIT

PLAINTIFFS:

Jeremy P. Gallant

DEFENDANTS:

Faisal Ahmed
Mr. Hawkins - Ms. Clegg
Mona Parks

2. COURT (IF FEDERAL COURT, NAME THE DISTRICT: IF STATE COURT, NAME THE COUNTY)

This Court -

3. DOCKET NUMBER

CASE 0:12-CV-099-

4. NAME OF THE JUDGE TO WHOM THE CASE WAS ASSIGNED

Chief Judge Drott

5. DISPOSITION (FOR EXAMPLE, WAS THE CASE DISMISSED? WAS IT APPEALED? IS IT STILL PENDING?)

Pending

6. APPROXIMATE DATE OF THE FILING OF THE LAWSUIT

MARCH, 2012

7. APPROXIMATE DATE OF THE DISPOSITION

- Pending -

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO

WESTERN DIVISION

LISTED PLAINTIFFS TO BE:

- 1.) JEREMY P. GALLANT - NO. 624-283
- 2.) LAWRENCE LITTLE - NO. 599-248
- 3.) STEVEN RAINES - NO. 582-055
- 4.) LUCAS RUDDOCK - NO. 612-348
- 5.) GREGORY DICKENS - NO. 287-726
- 6.) TREVNAUN HUNTER - NO. 645-052
- 7.) WALTER PARK - NO. 564-082
- 8.) DENVER S. MAYLE - NO. 650-040
- 9.) EDWARD L. HAMPTON - NO. 599-334
- 10.) DERRICK THOMAS III - NO. 555-112
- 11.) JERMAINE MC PUFFEY - NO. 642-094
- 12.) MARIO SYDNOR - NO. 627-917
- 13.) BUSTER JOHNSON - NO. 371-257
- 14.) DARYLE LOGAN - NO. 532-750
- 15.) DODSOB (REVISED) - NO. 714-541
- 16.) ISAAC NASH - NO. 550-844
- 17.) CHRIS BRADEN - NO. 659-178
- 18.) MARVIN DEARING - NO. 421-030
- 19.) CLAYTON JOHNSON - NO. 608-803
- 20.) LARRY FULLFORD - NO. 253-243
- 21.) PERRY BUCC - NO. 689-418
- 22.) REGINALD WILMORE - NO. 524-963
- 23.) HAROLD MC GRATH - NO. 645-642
- 24.) KENNETH PUCKETT - NO. 600-765
- 25.) JON DOE X 40 - 40 INDIVIDUAL PARTIES

ALL LISTED PARTIES ARE INVOLVED PERSONS TO THE CIVIL ASSERTIONS BROUGHT BEFORE THE HONORABLE COURTS. ALL PLAINTIFFS LISTED WITHIN SHARE THE SAME ADDRESS FOR SERVICE:
 SOUTHERN OHIO CORRECTIONAL FACILITY
 P.O. Box 45699
 LUCASVILLE, OH, 45699.

I, PLAINTIFF-PETITIONER JEREMY P. GALLANT, RESPECTFULLY REQUEST THE HONORABLE COURTS HOLD ALL LISTED PARTIES WITHIN AS PLAINTIFFS IN THE CURRENT CIVIL AFFAIRS FOR JUST CAUSE AND ENTITLED RELIEF.
 PLEASE RESPECTFULLY SUBMITTED: Lawrence Little

THANK YOU

Jeremy P. Gallant
 JEREMY P. GALLANT
 NO. 624-283-S.O.C.F.
 P.O. Box 45699
 LUCASVILLE, OH, 45699

- OHIO PRISONERS UNITED -

PLACE OF PRESENT CONFINEMENT

- A. IS THERE A PRISONER GRIEVANCE PROCEDURE IN THIS INSTITUTION?
YES (✓) NO ()
- B. DID YOU PRESENT THE FACTS RELATING TO YOUR COMPLAINT IN THIS STATE PRISONER GRIEVANCE PROCEDURE? YES (✓) NO ()

C. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

STEP 1 = Informal Complaint

STEP 2 = NOTIFICATION GRIEVANCE

STEP 3 = APPEAL

2. WHAT WAS THE RESULT?

ABSOLUTELY NO ACTION WAS
TAKEN -

D. IF YOUR ANSWER IS NO, EXPLAIN WHY NOT.

* NOTE * SOME PLAINTIFFS WERE
DENIED UTILIZATIONS WHILE OTHERS
ARE UNABLE TO INTELLIGENTLY UTILIZE -

E. IF THERE IS NO PRISON GRIEVANCE PROCEDURE IN THIS INSTITUTION, DID YOU COMPLAIN TO PRISON AUTHORITIES? YES (✓) NO ()

F. IF YOUR ANSWER IS YES:

1. WHAT STEPS DID YOU TAKE?

NOTIFIED RESPONSIBLE
STATE OFFICIALS -

2. WHAT WAS THE RESULT?

NOTHING

DEFENDANTS:

PLACE THE NAME AND ADDRESS OF EACH DEFENDANT YOU LISTED IN THE CAPTION ON THE FIRST PAGE OF THIS COMPLAINT. THIS FORM IS INVALID UNLESS EACH DEFENDANT APPEARS WITH FULL ADDRESS FOR PROPER SERVICE.

1. Mr. Holdren - S.O.C.I.F.
NAMES - FULL NAME PLEASE
P.O. Box 45699 - Lucasville, OH
ADDRESS - STREET, CITY, STATE AND ZIP CODE
2. Mr. Cool - P.O. Box 45699
Lucasville, OH, 45699
3. Mr. Cadogan - P.O. Box 45699
Lucasville, OH, 45699
4. Mrs. Mahiman - P.O. Box 45699
Lucasville, OH, 45699
5. Jon/Jane Does x 10
P.O. Box 45699 - Lucasville, OH, 45699
6. _____

IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE CONTINUE LISTING THEM.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO 1/6
- WESTERN DIVISION -

Jeremy P. Gallant + Lawrence Little
NO. 627-283 - S.O.C.F.
P.O. Box 2/5699
LUCASVILLE, OH, 2/5699

MARCH 3rd, 2016
SCIOTO COUNTY, OH

- Mr. Holdren -
ET AL
- DEFENDANTS -

CIVIL COMPLAINT ASSERTIONS
MONETARY/INJUNCTION RELIEF
CLASS ACTION CERTIFICATION
Respectfully:

I. NOW COMES PLAINTIFF-PETITIONER
Jeremy P. Gallant, PRO-SE, REQUESTING TO PROCEED
IN FORMA PAUPERIS IN A CERTIFIED CLASS ACTION
COMPLAINT...

II. PLAINTIFF brings THIS CIVIL COMPLAINT
ON BEHALF OF A CLASS OF PRISONERS PURSUANT TO --
42 U.S.C. § 1983. THE HONORABLE COURTS MAINTAIN
JURISDICTION UNDER 28 U.S.C. §§ 1331 & 1343. PLAINTIFF
ALSO SEEKS A DECLARATORY-DECLARATORY JUDGMENT PURSUANT
TO 28 U.S.C. § 2201 & 42 U.S.C. § 12133.

III. THE UNITED STATES DISTRICT COURTS, SOUTHERN
DISTRICT OF OHIO IN THE WESTERN DIVISION IS INFACT
THE APPROPRIATE VENUE UNDER 28 U.S.C. § 1391(b)(2)
DUE TO THE UNCONSTITUTIONAL TRANSGRESSIONS, EVENTS
AND OMISSIONS GIVING RISE TO THE CLAIM, TRANSPIRING
IN SAID COURTS VENUE OF LAW.

PLAINTIFF-PETITIONER
Jeremy P. Gallant, A PRISONER WHOM IS CURRENTLY
INCARCERATED WITHIN OHIO'S DEPARTMENT OF REHABILITATION
AND CORRECTIONS SOUTHERN OHIO CORRECTIONAL FACILITY -
(O.D.R.C. S.O.C.F.) WHICH RESIDES IN THE SOUTHERN
DISTRICT OF OHIO, COME BEFORE THE HONORABLE COURTS
ON BEHALF OF A CLASS OF PRISONERS ALL MAKING
THE SAME CIVIL ASSERTIONS. THE FOLLOWING LISTED
PARTIES ARE TO BE LISTED AS PLAINTIFFS IN THE
CURRENT CIVIL AFFAIRS..

PLAINTIFF: JEREMY P. GALLANT -
PLAINTIFF: STEVEN RAINES NO. 582-055 - PLAINTIFF -
LUCAS RUDDOCK NO. 612348 - PLAINTIFF: GREGORY PICKENS -
287-726 - PLAINTIFF TREVANAH HUNTER 645-052 - PLAINT -
IFF - WALTER PARK NO. 567-082 - PLAINTIFF LAWRENCE LITTLE
NO. 599-248 - 4 PLAINTIFFS JON DOES X 40 - , +
PLAINTIFF DENVER S. SPAYLE NO. 650-040 (REFER TO LIST) -

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO ²¹⁶

WESTERN DIVISION MARCH, 3rd, 2016

DEFENDANTS IN THIS CIVIL CLASS ACTION COMPLAINT ARE THE FOLLOWING LISTED RESPONSIBLE PARTIES ABLE TO BE IDENTIFIED. PLAINTIFF RESPECTFULLY REQUEST THE HONORABLE COURTS ASSIGN DESIGNATED RESERVATIONS FOR TO JAN/JANE DOE PARTIES AS FOR RESPONSIBLE UNIDENTIFIABLE PERSONS TO BE LISTED AS DEFENDANTS.

1.) DEFENDANT: MR. HOLDREN: S.O.C.F SAFETY AND SANITATIONS DEPARTMENT. MR. HOLDREN IS CHARGED WITH THE RESPONSIBILITY OF ENSURING THE OPERATIONS OF THIS FACILITY REMAIN IN COMPLIANCE WITH O.D.R.C. POLICY AND SAFETY/SANITATION SPECIFICATIONS. MR. HOLDREN INTENTIONAL FAILS TO UPHOLD THE ASSIGNED OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO UNCONSTITUTIONAL CONDITIONS RESULTING IN THE VIOLATIONS OF PLAINTIFFS RIGHTS. I HUMBLY REQUEST THE HONORABLE COURTS HOLD MR. HOLDREN ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY LISTING THIS PARTY AS A DEFENDANT IN CLASS ACTION CIVIL COMPLAINT BEFORE YOU.

2.) DEPUTY WARDEN OF OPERATIONS - MR. COOL: THIS PARTY IS CHARGED WITH THE RESPONSIBILITY OF ENSURING THE OPERATIONS OF THIS FACILITY REMAIN IN COMPLIANCE WITH O.D.R.C. POLICY. MR. COOL FAILS TO UPHOLD THESE OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO THE UNCONSTITUTIONAL INFICTIONS. EVEN AFTER MR. COOL WAS MADE CONSCIOUSLY AWARE OF SUCH CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS, MR. COOL INTENTIONALLY DISREGARDS SUCH RENDERING MR. COOL AS A ASSESSORY TO THE UNCONSTITUTIONAL TRANSGRESSIONS BY PERMITTING SUCH TO CONTINUE. I HUMBLY REQUEST THE HONORABLE COURTS HOLD MR. COOL ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY LISTING THIS PARTY AS A DEFENDANT IN THE CLASS ACTION COMPLAINT.

3.) DEPUTY WARDEN OF SPECIAL SERVICES - MR. CADOGAN: THIS PARTY IS CHARGED WITH THE RESPONSIBILITY OF ENSURING SERVICES WITHIN THIS FACILITY ARE PROVIDED IN COMPLIANCE WITH ODRC POLICY. MR. CADOGAN FAILS TO UPHOLD HIS OBLIGATIONS BY BEING DELIBERATELY INDIFFERENT TO SUCH AFTER BEING MADE CONSCIOUSLY AWARE. I HUMBLY ASK THE HONORABLE COURTS TO HOLD MR. CADOGAN ACCOUNTABLE FOR THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS BY THE LISTING OF THIS PARTY AS A DEFENDANT IN THIS CLASS ACTION COMPLAINT.

4.) INSPECTOR MAHIMAN - MRS. MAHIMAN IS CHARGED WITH THE RESPONSIBILITY OF SUPERVISING AND MONITORING OPERATIONS OF THIS FACILITY'S 5120-9-31 GRIEVANCE PROCEDURES WITH PRISONERS COMPLAINTS. DUE TO INSPECTOR MAHIMAN'S CONTINUED DELIBERATE INDIFFERENCE THE CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS DO TRANSPIRE. IN FACT, IT IS BECAUSE OF INSPECTOR MAHIMAN THAT THIS FACILITY CONTINUES IT'S UNCONSTITUTIONAL OPERATIONS. I HUMBLY REQUEST THE HONORABLE COURTS HOLD MRS. MAHIMAN ACCOUNTABLE AS A LISTED DEFENDANT.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO

3/6
EASTERN DIVISION

MARCH, 3rd, 2016

5.) JON/JANE DOES X 10 - I Humbly request the Honorable Courts assign Ten JON/JANE DOES in this civil class action complaint, for unidentified parties to be listed as defendants as their identities are made available...

PLAINTIFF HAS IN FACT LISTED ALL RESPONSIBLE PARTIES able to be identified as defendants in this matter and Humbly ask the courts to permit this action to proceed on. All defendants are being held in both individual and official capacities for the civil assertions.

All PLAINTIFFS, to the best of petitioner's knowledge, did in fact utilize and exhaust the available state/administrative remedies as federally required... before seeking relief with in this court...

THIS CIVIL CLASS ACTION COMPLAINT INVOLVES VIOLATIONS-DEPRIVATIONS OF LISTED PLAINTIFFS CONSTITUTIONAL RIGHTS, with regards to conditions of confinement and a particular incident that transpired on February 13th 2016 within the Southern Ohio Correctional Facility (S.O.C.F.) - SUCH UNCONSTITUTIONAL TRANSGRESSIONS WERE IN FACT INFLICTED UPON LISTED PLAINTIFFS AND A NUMBER OF OTHER PRISONERS. PLAINTIFF NOW BEGINS COMPLAINT DESCRIPTIONS FOR WHICH GIVE RISE TO THE CIVIL CLASS ACTION COMPLAINT.

1.) ON February 13th 2016 within S.O.C.F.'s Housing Unit J-2, AT or AROUND FOUR O'CLOCK IN THE MORNING THE LIVING QUARTERS MAIN SEWAGE LINE WAS DISCOVERED TO BE CONGESTED RESULTING IN A SIGNIFICANT AMOUNT OF BIO-HAZARD CONTAMINATES AND RAW SEWAGE TO POUR OUT OF THE SHOWER DRAINS AND PRISONERS TOILETS.

2.) S.O.C.F.'s J-2 HOUSING UNIT CONTAINS ABSOLUTELY NO FORM OF PRECAUTIONARY MEASURES, WITH REGARDS TO SEWAGE OVER-FLOW AND BACK-UP DRAINAGE SYSTEMS.

3.) THE J-2 HOUSING UNIT IS RESIDENCE TO A MAXIMUM CAPACITY OF 80 PRISONERS WHICH ALL SHARE ONE MAIN SEWAGE DRAIN FOR EACH OF THE 80 CELLS SINKS AND TOILETS.

4.) THE February 13th 2016, 4:00 A.M. discovery of BIO-HAZARD CONTAMINATES AND RAW SEWAGE OVER FLOW WAS IN FACT PERMITTED TO CONTINUE ON RESULTING IN ALL OF THE J-2 PRISONER'S FECAL URINE AND EXCREMENT DISPOSALS FLOODING ONTO THE LIVING QUARTERS RESIDENCE.

5.) THE J-2 HOUSING UNIT'S SEWAGE OVER FLOW WAS IN FACT PERMITTED TO CONTINUE A GOOD PORTION OF THE DAY - FROM ABOUT 4 A.M. TO AROUND 1-2:00 P.M.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO 2/16
WESTERN DIVISION

MARCH, 3rd, 2016

6.) BETWEEN THESE TIMES BIO-HAZARD CONTAMINATES RAW SEWAGE, FECAL MATTER AND UNKNOWN PARTICLES FLOWED FREELY, COMPLETELY SUBMERGING THE ENTIRE J-2 LIVING QUARTERS IN TOXIC LIQUIDS AND SUBJECTING THE PRISONERS TO IMMINENT DANGERS OF SERIOUS PHYSICAL HARM BY EXPOSURES TO POSSIBLE CONTRACTIONS OF INFECTIOUS DISEASE.

7.) DUE TO THE DEFENDANTS AND RESPONSIBLE STATE OFFICIALS DELIBERATE INDIFFERENCE AND LACK OF ACTIONS, RESPONSE, AND PRECAUTIONARY MEASURES THE J-2 PRISONERS WERE FORCED TO RESIDE IN SUCH CRUEL, DISGUSTINGLY FILTHY INHUMANE CONDITIONS FOR ABOUT 16 HOURS.

8.) FURTHERMORE, ON FEBRUARY 13TH, 2016, WITHIN S.O.C.F.'s HOUSING UNIT J-2, THE PRISONER AND LISTED PLAINTIFFS WERE FORCED TO CONSUME ALL 3 MEALS WHILE RESIDING IN STANDING RAW SEWAGE AND BIO-HAZARD CONTAMINATES, WHICH ALSO PLACED THE PRISONERS AT GRAVE RISK AND DANGERS!

9.) EVEN AFTER THE J-2 HOUSING UNITS CONGESTED SEWAGE LINE WAS CLEARED, PLAINTIFFS - PRISONERS WERE STILL INHUMANELY FORCED TO RESIDE IN STANDING SEWAGE AND BIO-HAZARD CONTAMINATES.

10.) ABSOLUTELY NO PROVISIONS WERE SUPPLIED TO THE PLAINTIFFS TO COMBAT THE STANDING SEWAGE, CLEAN THE CONTAMINATES, REPLACE THE POSSESSIONS AND CLOTHING EXPOSED, NOR WERE ANY SHOWERS OFFERED TO THE PRISONERS FOR DECONTAMINATION PURPOSES, WHICH IN AND OF ITSELF IS A VIOLATION OF PLAINTIFFS RIGHTS.

11.) FURTHERMORE, S.O.C.F. STATE OFFICIALS, IN PARTICULAR, THE MEDICAL DEPARTMENT, FAILED TO ACT ACCORDINGLY IN THE MATTER, NEVER DISPATCHING ANY FORM OF PROPER MEDICAL NOR TESTING, AS REQUIRED WHEN AN INDIVIDUAL IS EXPOSED TO BIO-HAZARDOUS CONTAMINATES. THIS AS WELL CONSTITUTES FURTHER DELIBERATE INDIFFERENCE AND CONSTITUTIONAL VIOLATIONS/DEPRIVATIONS.

12.) IN ATTEMPTS TO JUSTIFY THE CRUEL, INHUMANE, UNCONSTITUTIONAL IMPOSITIONS, IT WAS STATED THAT THE J-2 PRISONERS INTENTIONALLY FLOODED THE LIVING QUARTERS, WHICH IS A COMPLETE FABRICATION.

13.) THE FEBRUARY 13TH, 2016 "SATURDAY SEWAGE SPILL" INCIDENT IS A FACTUAL ASSERTION WHICH WAS ALL CAPTURED AND RECORDED ON VIDEO RECORDINGS, AND IS UNDISPUTED BY SURVEILLANCE.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO ⁵¹⁶

- WESTERN DIVISION -

MARCH, 3rd, 2016

PLAINTIFF-PETITIONER WOULD LIKE TO RESERVE THE RIGHT TO AMEND THIS SECTION OF COMPLAINT AFTER SECURING DECLARATIONS FROM WITNESSING PARTIES AND LISTED DEFENDANTS...

CONDITIONS OF CONFINEMENT

PLAINTIFF-PETITIONER ALSO RAISE UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT WITHIN S.O.C.F. ON BEHALF OF PRISONERS WHOM ARE FORCED TO RESIDE...

- 1.) FIRE SAFETY VIOLATIONS- S.O.C.F.'S HOUSING UNITS CELLS LACK ALL FIRE SAFETY MODIFICATIONS AND FURNISHINGS IN VIOLATION OF THE STATE'S FIRE MARSHALL'S MANDATES. THIS LACK OF FIRE PRECAUTIONS IS IN DIRECT VIOLATION OF PRISONERS CONSTITUTIONAL RIGHTS, WITH LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS CONTINUED DELIBERATE INDIFFERENCE AND INTENTIONAL DISREGARD SUBJECTING PLAINTIFFS TO IMMINENT DANGERS, WITH PLACE-MENT FOR POTENTIAL HARM, SERIOUS INJURY AND POSSIBLE DEATH, IN THE EVENT OF A FIRE. DEFENDANTS CONTINUE TO SUBJECT PRISONERS TO THESE UNCONSTITUTIONAL CONDITIONS IN VIOLATION OF PLAINTIFFS RIGHTS...
- 2.) Improper/Inadequate Air Ventilations - POOR AIR QUALITIES- DEFENDANTS AND RESPONSIBLE STATE OFFICIALS CONTINUE TO BE DELIBERATELY INDIFFERENT TO PRISONERS QUALITY OF AIR, BY INTENTIONALLY DISREGARDING THE S.O.C.F. HOUSING UNITS IMPROPER-INADEQUATE AND NON-FUNCTIONING AIR VENTILATIONS. THIS CONSTITUTIONAL INFRINGEMENT RESULTS IN POOR AIR QUALITY, EXPOSING THE PRISONERS AND PLAINTIFFS TO POSSIBLE CONTRACTION OF MIXED DUST DISEASE BY FORCING THE POPULATION TO BREATHE IN POLLUTED AIR PARTICLES. DEFENDANTS AND STATE OFFICIALS CONTINUE TO CONSCIOUSLY DISREGARD SUCH AIR POLLUTIONS BY FAILING TO ENSURE PROPER AIR VENTILATIONS, WHICH IS IN VIOLATION OF PLAINTIFFS CONSTITUTIONAL RIGHTS...
- 3.) NOISE DECIBELS- DANGEROUSLY HIGH & EXCEEDING LEVELS OF NOISE DECIBELS. LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS CONTINUE TO BE DELIBERATELY INDIFFERENT TO S.O.C.F.'S HOUSING UNITS DANGEROUSLY HIGH AND EXCEEDING LEVELS OF NOISE DECIBELS, BY REFUSING TO TAKE NECESSARY MEASURES TO COMBAT THE UNCONSTITUTIONAL INFLECTIONS. LISTED DEFENDANTS AND RESPONSIBLE STATE OFFICIALS COMPLETELY DISREGARD SUCH FACTOR IN DIRECT VIOLATION OF PLAINTIFFS CONSTITUTIONAL RIGHTS...
- 4.) SOLITARY CONFINEMENT. THE DURATIONS AND MEANS OF IMPLEMENTING SOLITARY CONFINEMENT ARE GROSSLY INHUMANE AND UNCONSTITUTIONAL IN VIOLATIONS OF PRISONERS CONSTITUTIONAL RIGHTS. PLAINTIFF-PETITIONER WOULD HUMBLY REQUEST TO AMEND THIS SECTION OF COMPLAINT AT A LATER TIME FOR PROPER ALLEGATIONS TO BE MADE...

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF OHIO ⁶¹⁶

WESTERN DIVISION

MARCH, 3rd, 2016

JUSTIFICATIONS FOR CAUSE OF ACTION

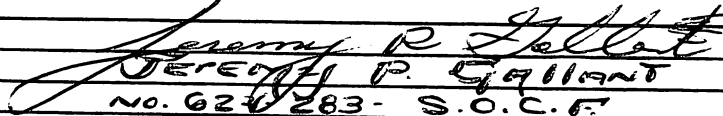
PLAINTIFFS LISTED WITHIN THIS CLASS ACTION CIVIL COMPLAINT ARE IN FACT ENTITLED TO PROCEED IN COURTS ADJUDICATIONS AS A MATTER OF CONSTITUTIONAL LAW. ALL PLAINTIFFS ARE AMERICAN CITIZENS AND SUFFERED THE CONSTITUTIONAL VIOLATIONS-DEPRIVATIONS AS ASSERTED IN COMPLAINT TRANSCRIPTIONS. LISTED DEFENDANTS AND UNIDENTIFIABLE STATE OFFICIALS, DID IN FACT COMMIT VIOLATIONS OF PLAINTIFFS CONSTITUTIONAL RIGHTS, BY EITHER PERSONAL PARTICIPATIONS, OR INTENTIONAL FAILURES TO CEASE THE TRANSGRESSIONS. PLAINTIFFS, BY LISTED DEFENDANTS UNCONSTITUTIONAL INFLICTIONS, SUFFER FROM VIOLATIONS & DEPRIVATIONS OF THEIR 8TH AMENDMENT RIGHTS TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT BY BEING FORCEFULLY SUBJECTED TO GROSSLY INHUMANE... CONDITIONS IN NUMEROUS FASHIONS. PLAINTIFFS IN CIVIL COMPLAINT RESPECTFULLY REQUEST THE HONORABLE COURTS INTERPRET THE UNCONSTITUTIONAL TRANSGRESSIONS AS THEY ARE TO BE, WITH RIGHTFULL ORDER MADE..

PRAYER FOR ENTITLED RELIEF

THEREFORE, ALL PLAINTIFFS LISTED IN THIS CIVIL CASE, HUMBLY REQUEST THE HONORABLE COURTS:

- A.) DECLARE THAT THE ACTS AND OMISSIONS DESCRIBED WITHIN THESE CIVIL ASSERTIONS VIOLATE PLAINTIFFS' RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES OF AMERICA..
- B.) ORDER DEFENDANTS TO PAY COMPENSATORY AND PUNITIVE DAMAGES, TO EACH OF THE PLAINTIFFS..
- C.) ORDER DEFENDANTS TO PAY REASONABLE ATTORNEY FEES AND ALL COURT COST.
- D.) GRANT ANY OTHER JUST AND EQUITABLE RELIEF THAT THIS HONORABLE COURT MAY DEEM NECESSARY..

RESPECTFULLY SUBMITTED -
(ON BEHALF OF PLAINTIFFS)


JEREMY P. GALLANT
NO. 624283- S.O.C.F.
P.O. Box 25699
LUCASVILLE, OH, 45699

I, JEREMY P. GALLANT, PURSUANT TO 28 U.S.C. § 1746, DO DECLARE AND VERIFY UNDER PAINS & PENALTIES OF PERJURY AND UNDER THE LAWS OF THE UNITED STATES OF AMERICA, THAT THE FOREGOING TRANSCRIPTIONS ARE TRUE, CORRECT, AND EXACT RECITINGS TO THE BEST OF MY KNOWLEDGE. THIS I SWEAR TO AND AFFIRM IN A COURT OF LAW. * EXECUTED MARCH, 3rd, 2016 *